

United States Environmental Protection Agency Air and Radiation Stratospheric Protection Division 6205J

#### Halon Substitutes Under SNAP as of June 8, 1999

SNAP Information: http://www.epa.gov/ozone/title6/snap/snap.html Stratospheric Ozone Protection Hotline: (800) 296-1996

EPA has created the Significant New Alternatives Policy (SNAP) Program under section 612 of the Clean Air Act Amendments. SNAP evaluates alternatives to ozone-depleting substances. Substitutes are reviewed on the basis of ozone depletion potential, global warming potential, toxicity, flammability, and exposure potential as described in the March 18, 1996 final SNAP rule (59 FR 13044). Lists of acceptable and unacceptable substitutes will be updated periodically in the Federal Register. The following SNAP notices and subsequent final rules are included in this list: August 26, 1994 (59 FR 44240), January 13, 1995 (60 FR 3318), June 13, 1995 (60 FR 31092), July 28, 1995 (60 FR 38729), February 8, 1996 (61 FR 4736), May 22, 1996 (61 FR 25585), September 5, 1996 (61 FR 47012), October 16, 1996 (61 FR 54030), March 10, 1997 (62 FR 10700), June 3, 1997 (62 FR 30275), February 24, 1998 (63 FR 9151), May 22, 1998 (63 FR 28251), January 26, 1999 (64 FR 3861), April 28, 1999 (64 FR 22981)., and June 8, 1999 (64 FR 30410).

### Acceptable Substitutes for Halon 1211 Streaming Agents Under the Significant New Alternatives Policy (SNAP) Program as of June 8, 1999

Substitute	Trade Name	Comments
HCFC-123	FE-232	Non-residential uses only.
HCFC-124	FE-241	Non-residential uses only.
[HCFC Blend] B	Halotron 1	Non-residential uses only.
[HCFC Blend] C	NAF P-III	Non-residential uses only.
[HCFC Blend] D	Blitz III	Non-residential uses only.
Gelled Halocarbon/Dry Chemical Suspension	Envirogel	Allowable in the residential use market.
[Surfactant Blend] A	Cold Fire, FlameOut	
Water Mist Systems using Potable or Natural Sea Water		
Carbon Dioxide		
Dry Chemical		
Water		
Foam		

## Acceptable Substitutes for Halon 1211 Streaming Agents Subject to Narrowed Use Limits under the Significant New Alternatives Policy (SNAP) Program as of June 8, 1999

Substitute	Trade Name	Limitations	Comments
HFC-227ea	FM-200	Acceptable in nonresidential uses only.	See comments 1, 2
HFC-236fa		Acceptable in nonresidential uses when manufactured using any process that does not convert perfluoroisobutylene (PFIB) directly to HFC-236fa in a single step.	See comments 1, 2, 3
CF <sub>3</sub> I		Acceptable in nonresidential uses only.	
C <sub>6</sub> F <sub>14</sub>	PFC-614, CEA-614	Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements because of their physical or chemical properties.	Users should observe the limitations on PFC acceptability by making reasonable effort to undertake the following measures:  (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation of such measures should be available for review upon request.</b>
			See additional comments 1, 2

#### **Additional Comments**

- 1. Discharge testing and training should be strictly limited only to that which is essential to meet safety or performance requirements.
- 2. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
- 3. Acceptable for local application systems inside textile process machinery.

## Acceptable Substitutes for Halon 1301 Total Flooding Agents Under the Significant New Alternatives Policy (SNAP) Program as of June 8, 1999

Substitute	Trade Name	Comments
Powdered Aerosol C	PyroGen, Soyuz	For use in unoccupied areas only.
Powdered Aerosol A	SFE	For use in unoccupied areas only.
Carbon Dioxide		System design must adhere to OSHA 1910.162(b)(5) and NFPA Standard 12
Water		
Water Mist Systems using Potable or Natural Sea Water		
Foam A (formerly [Water Mist / Surfactant Blend] A)	Phirex+	This agent is not a clean agent, but is a low-density, short duration foam.

## Acceptable Substitutes for Halon 1301 Total Flooding Agents Subject to Narrowed Use Limits under the Significant New Alternatives Policy (SNAP) Program as of June 8, 1999

Substitute	Trade Name	Limitations	Comments
HFC-236fa		Acceptable when manufactured using any process that does not convert perfluoroisobutylene (PFIB) directly to HFC-236fa in a single step:  - for use in explosion suppression and explosion inertion applications, and  - for use in fire suppression applications where other non-PFC agents or alternatives are not technically feasible due to performance or safety requirements:  (a) because of their physical or chemical properties, or  (b) where human exposure to the extinguishing agents may result in failure to meet applicable use conditions  For a discussion of the applicable use conditions see the Use	The comparative design concentration based on cup burner values is approximately 6.4%.  Users should observe the limitations on HFC-236fa acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation of such measures should be available for review upon request.</b> Feasible for use in a normally occupied area.  See additional comments 1, 2, 3, 4
		Conditions section below.	

Substitute	Trade Name	Limitations	Comments
$C_3F_8$	PFC-218, CEA-308	Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements:  (a) because of their physical or chemical properties, or  (b) where human exposure to the extinguishing agents may result in failure to meet applicable use conditions  For a discussion of the applicable use conditions see the Use Conditions section below.	The comparative design concentration based on cup burner values is approximately 8.8%.  Users should observe the limitations on PFC acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation of such measures should be available for review upon request.</b> The principal environmental characteristic of concern for PFCs is that they have high GWPs and long atmospheric lifetimes. Actual contributions to global warming depend upon the quantities of PFCs emitted. For additional guidance regarding applications in which PFCs may be appropriate, users should consult the description of potential uses which is included in the March 18, 1994 final rule (59 FR 13044).  See additional comments 1, 2, 3, 4
C <sub>4</sub> F <sub>10</sub>	PFC-410, CEA-410	Acceptable for nonresidential uses where other alternatives are not technically feasible due to performance or safety requirements:  (a) because of their physical or chemical properties, or  (b) where human exposure to the extinguishing agents may result in failure to meet applicable use conditions  For a discussion of the applicable use conditions see the Use Conditions section below.	The comparative design concentration based on cup burner values is approximately 6.6%.  Users should observe the limitations on PFC acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation of such measures should be available for review upon request.</b> The principal environmental characteristic of concern for PFCs is that they have high GWPs and long atmospheric lifetimes. Actual contributions to global warming depend upon the quantities of PFCs emitted. For additional guidance regarding applications in which PFCs may be appropriate, users should consult the description of potential uses which is included in the March 18, 1994 final rule (59 FR 13044).  See additional comments 1, 2, 3, 4
SF <sub>6</sub>		Only for use as a discharge agent in military applications and in civilian aircraft.	Users should limit testing only to that which is essential to meet safety or performance requirements.  This agent is used only to test new Halon 1301 systems.

#### **Additional Comments**

- 1. Should conform with OSHA 29 CFR 1910 Subpart L Section 1910.160.
- 2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
- 3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
- 4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.

Substitute	Trade Name	Conditions	Comments
HCFC-22		Where egress from an area cannot be accomplished within one minute, the employer shall not use this agent in concentrations exceeding its cardiotoxic NOAEL of 2.5%.	The comparative design concentration based on cup burner values is approximately 13.9% while its cardiotoxic LOAEL is 5.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.
		Where egress takes longer than 30 seconds but less than one minute, the employer shall not use the agent in a concentration greater than its cardiotoxic LOAEL of 5.0%.	See additional comments 1, 2, 3, 4
		HCFC-22 concentrations greater than 5.0% are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	
HCFC-124		Where egress from an area cannot be accomplished within one minute, the employer shall not use this agent in concentrations exceeding its cardiotoxic NOAEL of 1.0%.	The comparative design concentration based on cup burner values is approximately 8.4% while its cardiotoxic LOAEL is 2.5%. Thus, it is unlikely that this agent will be used in normally occupied areas.
		Where egress takes longer than 30 seconds but less than one minute, the employer shall not use the agent in a concentration greater than its cardiotoxic LOAEL of 2.5%.	See additional comments 1, 2, 3, 4
		HCFC-123 concentrations greater than 2.5% are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	
[HCFC Blend] A	NAF S-III	Where egress from an area cannot be accomplished within one minute, the employer shall not use [HCFC Blend] A in concentrations exceeding its cardiotoxic NOAEL of 10.0%	The comparative design concentration based on full scale testing is approximately 8.6%.
		Where egress takes greater than 30 seconds but less than one minute, the employer shall not use [HCFC Blend] A in a concentration greater than its cardiotoxic LOAEL of 10.0%.	The agent should be recovered from the fire protection system in conjunction with testing or servicing, and should be recycled for later use or destroyed.  Feasible for use in a normally occupied area.
		[HCFC Blend] A concentrations greater than 10 percent are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	See additional comments 1, 2, 3, 4

Substitute	Trade Name	Conditions	Comments
HFC-23	FE 13	Where egress from an area cannot be accomplished within one minute, the employer shall not use HFC-23 in concentrations exceeding 30%.  Where egress takes greater than 30 seconds but less than one minute, the employer shall not use HFC-23 in a concentration greater than 50.0%.  HFC-23 concentrations greater than 50 percent are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.  The design concentration must result in an oxygen level of at least 16%.	The comparative design concentration based on cup burner values is approximately 14.4% while data indicates that its cardiotoxicity NOAEL is 30% without added oxygen and 50% with added oxygen. Its LOAEL is likely to exceed 50%.  Feasible for use in a normally occupied area.  See additional comments 1, 2, 3, 4
HFC-125	FE 25	Where egress from an area cannot be accomplished within one minute, the employer shall not use this agent in concentrations exceeding its cardiotoxic NOAEL of 7.5%.  Where egress takes longer than 30 seconds but less than one minute, the employer shall not use the agent in a concentration greater than its cardiotoxic LOAEL of 10.0%.  HFC-125 concentrations greater than 10.0% are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	The comparative design concentration based on cup burner values is approximately 11.3% while its cardiotoxic LOAEL is 10.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.  See additional comments 1, 2, 3, 4
HFC-134a		Where egress from an area cannot be accomplished within one minute, the employer shall not use this agent in concentrations exceeding its cardiotoxic NOAEL of 4.0%.  Where egress takes longer than 30 seconds but less than one minute, the employer shall not use the agent in a concentration greater than its cardiotoxic LOAEL of 8.0%.  HFC-134a concentrations greater than 8.0% are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	The comparative design concentration based on cup burner values is approximately 12.6% while its cardiotoxic LOAEL is 8.0%. Thus, it is unlikely that this agent will be used in normally occupied areas.  See additional comments 1, 2, 3, 4

Substitute	Trade Name	Conditions	Comments
HFC-227ea	FM-200	Where egress from an area cannot be accomplished within one minute, the employer shall not use HFC-227ea in concentrations exceeding its cardiotoxic NOAEL of 9.0%.	The comparative design concentration based on cup burner values is approximately 7.0% while data indicate that its cardiotoxicity LOAEL is probably greater than 10.5%. EPA is accepting 10.5% as its LOAEL.
		Where egress takes longer than 30 seconds but less than one minute, the employer shall not use the agent in a concentration greater than its cardiotoxic LOAEL of 10.5%.	This agent was submitted to the Agency as a Premanufacture Notice (PMN) agent and is presently subject to requirements contained in a Toxic Substances Control Act (TSCA) Significant New Use Rule (SNUR).
		HFC-227ea concentrations greater than 10.5% are only permitted in areas not normally occupied by employees provided that any employee in the area can escape within 30 seconds. The employer shall assure that no unprotected employees enter the area during agent discharge.	Feasible for use in a normally occupied area.  See additional comments 1, 2, 3, 4
HFC-236fa		For occupied areas from which personnel cannot be evacuated in one minute, use is permitted only up to concentrations not exceeding the cardiotoxicity NOAEL of 10%;	The comparative design concentration based on cup burner values is approximately 6.4%.
			Users should observe the limitations on HFC-236fa acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical
			constraints of the other available agents preclude their use; and (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation</b>
		Design concentration must result in oxygen levels of at least 16%.  See additional comment 5	of such measures should be available for review upon request.  Feasible for use in a normally occupied area.
		For a discussion of the limitations on HFC-236fa applicability see the Narrowed Use Limits section above.	See additional comments 1, 2, 3, 4

Substitute	Trade Name	Conditions	Comments
$C_3F_8$	PFC-218, CEA- 308	For occupied areas from which personnel cannot be evacuated in one minute, use is permitted only up to concentrations not exceeding the cardiotoxicity NOAEL of 30%.	The comparative design concentration based on cup burner values is approximately 8.8%.
		Although no LOAEL has been established for this product, standard OSHA requirements apply, i.e. for occupied areas from which personnel can be evacuated or egress can occur between 30 and 60 seconds, use is permitted up to a concentration not exceeding the LOAEL.	Users should observe the limitations on PFC acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; (iii) determine that human exposure to the other alternative extinguishing agents may result in failure to meet applicable use conditions; <b>Documentation</b>
		All personnel must be evacuated before concentration of C <sub>3</sub> F <sub>8</sub> exceeds 30%.	of such measures should be available for review upon request.
		Design concentration must result in oxygen levels of at least 16%.	The principal environmental characteristic of concern for PFCs is that they have
		See additional comment 5 $ For \ a \ discussion \ of \ the \ limitations \ on \ C_3F_8 \ applicability \ see \ the \ Narrowed \ Use \\ Limits \ section \ above. $	high GWPs and long atmospheric lifetimes. Actual contributions to global warming depend upon the quantities of PFCs emitted. For additional guidance regarding applications in which PFCs may be appropriate, users should consult the description of potential uses which is included in the March 18, 1994 final rule (59 FR 13044).
			See additional comments 1, 2, 3, 4
$C_4F_{10}$	PFC-410, CEA- 410	For occupied areas from which personnel cannot be evacuated in one minute, use is permitted only up to concentrations not exceeding the cardiotoxicity NOAEL of 40%.	The comparative design concentration based on cup burner values is approximately 6.6%.
		Although no LOAEL has been established for this product, standard OSHA requirements apply, i.e. for occupied areas from which personnel can be evacuated or egress can occur between 30 and 60 seconds, use is permitted up to a concentration not exceeding the LOAEL.	Users should observe the limitations on PFC acceptability by taking the following measures: (i) conduct an evaluation of foreseeable conditions of end use; (ii) determine that the physical or chemical properties or other technical constraints of the other available agents preclude their use; (iii) determine that human exposure to the other alternative extinguishing
		All personnel must be evacuated before concentration of $C_4F_{10}$ exceeds 40%.	agents may result in failure to meet applicable use conditions; <b>Documentation</b> of such measures should be available for review upon request.
		Design concentration must result in oxygen levels of at least 16%.  See additional comment 5	The principal environmental characteristic of concern for PFCs is that they have high GWPs and long atmospheric lifetimes. Actual contributions to global
		For a discussion of the limitations on $C_4F_{10}$ applicability see the Narrowed Use Limits section above.	warming depend upon the quantities of PFCs emitted. For additional guidance regarding applications in which PFCs may be appropriate, users should consult the description of potential uses which is included in the March 18, 1994 final rule (59 FR 13044).
			See additional comments 1, 2, 3, 4
CF₃I		For use in normally unoccupied areas only.  Any employee that could possibly be in the area must be able to escape within 30	The weight equivalence of this agent is 1.36 compared to halon 1301, and its volume equivalence is 1.0 However, its cardiotoxic LOAEL is 0.4%. Thus, the manufacturer has not submitted this agent for use in normally occupied areas.
		seconds. The employer shall ensure that no unprotected employees enter the area during agent discharge.	See additional comments 1, 2, 3, 4

Substitute	Trade Name	Conditions	Comments
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IG-01 (formerly Inert Gas Blend C)	Argotec	IG-01 systems may be designed to an oxygen level of 10% if employees can egress the area within one minute, but may be designed only to the 12% oxygen level if it takes longer than one minute to egress the area.	The Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self Contained Breathing Apparatus (SCBA) as required by OSHA.
Gus Blend C)		If the possibility exists for the oxygen to drop below 10%, employees must be evacuated prior to such oxygen depletion.	EPA does not encourage any employee to intentionally remain in the area after system discharge, even in the event of accidental discharge. In addition, the system must include alarms and warning mechanisms as specified by OSHA.
		A design concentration of less than 10% may only be used in normally unoccupied areas, as long as an employee who could possibly be exposed can egress within 30 seconds.	See additional comments 1, 2.
IG-55 (formerly Inert	Argonite	IG-55 systems may be designed to an oxygen level of 10% if employees can egress the area within one minute, but may be designed only to the 12% oxygen level if it takes longer than one minute to egress the area.	The Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self-Contained Breathing Apparatus (SCBA) as required by OSHA.
Gas Blend B)		If the possibility exists for the oxygen to drop below 10%, employees must be evacuated prior to such oxygen depletion. A design concentration of less than 10% may only be used in normally unoccupied areas, as long as any employee who could possibly be exposed can egress within 30 seconds.	EPA does not encourage any employee to intentionally remain in the area after discharge, even in the event of accidental discharge. In addition, the system must include alarms and warning mechanisms as specified by OSHA.  See additional comments 1, 2
IG-541	Inergen	The design concentration must result in at least 10% oxygen and no more than 5% $\rm CO_2$ .  If the oxygen concentration of the atmosphere falls below 10%, personnel must be evacuated and egress must occur within 30 seconds.	Studies have shown that healthy, young individuals can remain in a 10% to 12% oxygen atmosphere for 30 to 40 minutes without impairment. However, in a fire emergency, the oxygen level may be reduced below safe levels, and the combustion products formed by the fire are likely to cause harm. Thus, the Agency does not contemplate personnel remaining in the space after system discharge during a fire without Self Contained Breathing Apparatus (SCBA) as required by OSHA.  Feasible for use in a normally occupied area.
			See additional comments 1, 2
Gelled Halocarbon/Dry Chemical	Envirogel	For use in normally unoccupied areas only.  Any employee who could possibly be in the area must be able to escape within 30	The manufacturer's SNAP application requested listing for use in unoccupied areas only.
Suspension		seconds. The employer shall ensure that no unprotected employees enter the area during agent discharge.	See additional comment 2.

Substitute	Trade Name	Conditions	Comments
Inert Gas/Powdered			The manufacturer's SNAP application requested listing for use in unoccupied areas only.
Aerosol Blend		Any employee who could possibly be in the area must be able to escape within 30 seconds. The employer shall ensure that no unprotected employees enter the area during discharge.	See additional comment 2.

#### **Additional Comments**

- 1. Must conform with OSHA 29 CFR 1910 Subpart L Section 1910.160.
- 2. Per OSHA requirements, protective gear (SCBA) must be available in the event personnel must reenter the area.
- 3. Discharge testing should be strictly limited only to that which is essential to meet safety or performance requirements.
- 4. The agent should be recovered from the fire protection system in conjunction with testing or servicing, and recycled for later use or destroyed.
- 5. EPA has no intention of duplicating or displacing OSHA coverage related to the use of personal protective equipment (e.g., respiratory protection), fire protection, hazard communication, worker training or any other occupational safety and health standard with respect to EPAs regulation of halon substitutes.

#### Unacceptable Substitutes for Halon Fire Suppression and Explosion Protection Systems under the Significant New Alternatives Policy (SNAP) Program as of June 8, 1999 **Trade** Reason Substitute **ODS Being Replaced** Name CFC-11 This agent has been suggested for use on large outdoor fires for which non-ozone depleting alternatives are currently available. Halon 1211 streaming agents In addition, CAAA section 610 bans the use of CFCs in portable extinguishers. HFC-32 Halon 1301 total flooding agents This agent is flammable. Chlorobromomethane Halon 1301 total flooding agents Other alternatives exist with zero or lower ODP; OSHA regulations prohibit its use as an extinguishing agent in fixed extinguished systems where employees may be exposed. See 29 CFR 1910.160(b)(11).